Document 91-4

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Exhibit C

From: Bandyopadhyay, Esha (Perkins Coie) **Sent:** Tuesday, July 31, 2007 10:05 AM

To: 'Corgill, Dennis S.' Subject: RE: Rule 37 Motion

Dennis-

We continue to disagree with your assertions regarding FreecycleSunnyvale's failure to identify its witnesses as required by the Federal Rules of Civil Procedure.

In regard to you your proposal below, as you know, FreecycleSunnyvale previously made this proposal in a letter dated July 25, 2007, though FreecycleSunnyvale later withdrew the offer in a subsequent letter. In response to your July 25th letter, I set forth a counter-proposal in an e-mail of that same date. To the extent that FreeycleSunnyvale is now reintroducing its proposal, we request that you please review and respond to The Freecycle Network's counter-proposal in my email of July 25th. Please let me know if you have any further questions.

Regards, Esha

From: Corgill, Dennis S. [mailto:DCorgill@mayerbrownrowe.com]

Sent: Monday, July 30, 2007 3:21 PM **To:** Bandyopadhyay, Esha (Perkins Coie)

Subject: Rule 37 Motion

Esha,

With respect to the Declaration of Miles Dennis Robertson, Jr., as previously indicated, any objection under Fed.R.Civ.P. 37 is unfounded and, therefore, frivolous. In an effort not to burden the court with motions, however, FreecycleSunnyvale will not object to extending the discovery cutoff of August 3rd solely with respect to a deposition of Miles Dennis Robertson, Jr. If this is agreeable to The Freecycle Network, please let me know.

Cheers, Dennis

Dennis S. Corgill Mayer, Brown, Rowe & Maw LLP Two Palo Alto Square, Suite 300 3000 El Camino Real

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